

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

SONYA LARSON,

Plaintiff

v.

C. A. No.: 1:19-CV-10203-IT

DAWN DORLAND PERRY,  
COHEN BUSINESS LAW GROUP, PC and  
JEFFREY A. COHEN, ESQUIRE,

Defendants.

**PARTIES JOINT STATEMENT CONCERNING MEDIATION PRIOR TO DECISIONS  
ON PENDING MOTIONS TO DISMISS AND/OR  
MOTION FOR LEAVE TO AMEND THE COMPLAINT**

Pursuant to the Court's request at the June 18, 2019 scheduling conference, the parties have conferred concerning their interest in mediating this matter prior to any decision by the Court on the currently-pending motions to dismiss, or the since-filed motion for leave to amend the complaint. After having had the opportunity to meet and confer, and following Defendants' review of a settlement demand advanced by Plaintiff, the parties are in agreement that mediation at this stage of litigation would not be fruitful.

The parties will continue to reassess their position concerning mediation as the case progresses. Specifically, the parties will reassess the feasibility of mediation once the scope of the case – including remaining parties, claims and counterclaims – is determined following the Court's decisions (if any) on the pending motions.

In conclusion, the parties are not seeking a referral to the Court's mediation program at this time.

Dated: July 8, 2019

Respectfully submitted,

SONYA LARSON

/s/ Andrew D. Epstein

Andrew D. Epstein, Esq.  
[Photolaw@aol.com](mailto:Photolaw@aol.com)  
Barker, Epstein & Loscocco  
176 Federal St.  
Boston, MA 02110  
617-482-4900

DAWN DORLAND PERRY,

By her attorneys,

/s/ Suzanne Elovecky

Howard M. Cooper, Esq. (BBO # 543842)  
[hcooper@toddweld.com](mailto:hcooper@toddweld.com)  
Suzanne Elovecky, Esq. (BBO # 670047)  
[selovecky@toddweld.com](mailto:selovecky@toddweld.com)  
Elizabeth Olien, Esq. (BBO # 689350)  
[eolien@toddweld.com](mailto:eolien@toddweld.com)  
TODD & WELD LLP  
One Federal Street, 27<sup>th</sup> Floor  
Boston, MA 02110  
617-720-2626

COHEN BUSINESS LAW GROUP, PC and  
JEFFREY A. COHEN, ESQUIRE

By their attorneys,

/s/ Matthew Greene

Mark W. Shaughnessey, Esq. (BBO # 567839)  
[mshaughnessey@boyleshaughnessey.com](mailto:mshaughnessey@boyleshaughnessey.com)  
Matthew H. Greene, Esq. (BBO # 673947)  
[mgreene@boyleshaughnessey.com](mailto:mgreene@boyleshaughnessey.com)  
Jeffrey W. Gordon, Esq. (BBO # 698874)  
[jgordon@boyleshaughnessey.com](mailto:jgordon@boyleshaughnessey.com)  
Boyle | Shaughnessey Law, P.C.  
695 Atlantic Ave., 11<sup>th</sup> Floor  
Boston, MA 02111  
Phone: (617) 451-2000  
Fax: (617) 451-5775